

Exhibit 4

Windham Declaration

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
_____)	

**DECLARATION OF MARK J. WINDHAM IN SUPPORT OF THE RESCAP
BORROWER CLAIMS TRUST'S OBJECTION TO CLAIM NO. 2188
FILED BY KENNETH REAVES**

I, Mark J. Windham, declare as follows:

1. I am an attorney with the law firm of Troutman Sanders LLP.
2. I submit this declaration (the "Declaration") in support of the *ResCap Borrower Claims Trust's Objection To Claim Nos. 2188 Filed By Kenneth Reaves* (the "Objection").¹
3. Troutman Sanders LLP currently represents U.S. Bank National Association and GMAC Mortgage, LLC in litigation between those parties and the Claimant, Kenneth Reaves ("Reaves"), before the United States District Court for the Northern District of Georgia, Civil Action File No. 1:11-cv-04138-AT (the "District Court Litigation").
4. The District Court Litigation is stayed pending resolution of the Objection.
5. Attached hereto as Exhibit A is a true and correct copy of a transcript of the April 27, 2012 deposition of Carita Bowers that was taken in connection with the District Court Litigation.

¹ Defined terms used but not defined herein shall have the meanings ascribed to such terms in the Objection.

6. Attached hereto as Exhibit B is a true and correct copy of a transcript of the April 27, 2012 deposition of Kenneth Reaves that was taken in connection with the District Court Litigation.

7. Attached hereto as Exhibit C is a Publisher's Affidavit from the The Champion, which is the legal organ for DeKalb County, Georgia, which published the advertisement for the September 6, 2011 foreclosure sale that is the subject of the Objection.

I declare, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on December 18th, 2015, at Atlanta, Georgia.

/s/ Mark J. Windham
Mark J. Windham